

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

NOVA SERVICES INC.,

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Plaintiff,

*

v.

*

Case No.: 1:20-cv-02773-RDB

RECLEIM NOVA, LLC,

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RECLEIM, LLC,

BLUE GRANITE LOGISTICS, LLC,

*

and LL SEA INVESTMENTS, LLC,

*

Defendants.

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**DEFENDANTS RECLEIM NOVA, LLC, RECLEIM, LLC, BLUE GRANITE LOGISTICS, LLC
AND LL SEA INVESTMENTS, LLC'S STATEMENT OF REMOVAL**

Pursuant to this Court's Standing Order Concerning Removal (Doc. 5), Defendants state as follows:

1. Recleim, LLC, the removing party, was served with a copy of the summons and complaint on August 24, 2020. Blue Granite Logistics, LLC and LL Sea Investments, LLC were served with a copy of the summons and complaint on August 24, 2020. Recleim Nova, LLC was served with a copy of the summons and complaint on August 18, 2020.

2. Recleim, LLC, Blue Granite Logistics, LLC and LL Sea Investments, LLC were first served with a paper identifying the basis for removal on August 24, 2020, while Recleim Nova, LLC was first served with a paper identifying the basis for removal on August 18, 2020. All Defendants consent to removal. Removal is proper pursuant to 28 U.S.C. § 1446(b)(2)(C), which provides that "(i)f defendants are served at different times, and a later-served defendant files a notice of removal, any earlier-served defendant may consent to the removal even though that earlier-served defendant did not previously initiate or consent to removal."

3. No Defendant is a citizen of Maryland.

4. Recleim, LLC is a limited liability company. Recleim, LLC is made up of several members, consisting of individuals and limited liability companies. The members of Recleim, LLC are citizens of Georgia, Alabama, Connecticut, Florida, Nevada, Illinois, Texas, South Carolina, New York, North Carolina, and New Jersey. None of Recleim, LLC's members are citizens of Maryland.

5. Recleim Nova, LLC is a limited liability company. Its sole member is Recleim, LLC. Thus, Recleim Nova, LLC is a citizen of Georgia, Alabama, Connecticut, Florida, Nevada, Illinois, Texas, South Carolina, New York, North Carolina, and New Jersey, and is not a citizen of Maryland.

6. LL Sea Investments, LLC is a limited liability company. LL Sea Investments, LLC's members are Peter Davis and Allison Davis. Peter Davis is a United States citizen and is domiciled in Georgia. Allison Davis is a United States citizen and is domiciled in Georgia. Consequently, LL Sea Investments, LLC is a citizen of Georgia.

7. Blue Granite Logistics, LLC is a limited liability company. The sole member of Blue Granite Logistics, LLC is BGL Holdings, LLC. The members of BGL Holdings, LLC are LL Sea Investments, LLC and John Robinson. John Robinson is a United States citizen and is domiciled in South Carolina. LL Sea Investments, LLC is a Georgia citizen.

Dated: October 7, 2020

Respectfully submitted,

/s/ Ryan M. Bates

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Attorney for Defendants

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of October, 2020, a copy of the foregoing STATEMENT OF REMOVAL was electronically filed and served through the Court CM/ECF system upon the counsel below:

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/s/ Ryan M. Bates

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